

HAGNER & ZOHLMAN, LLC

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Attorney for: Plaintiff

By: Thomas J. Hagner, Esquire

LUCIANA BAKER

Plaintiff,

Vs.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CIVIL ACTION NO. 08-cv-6382 (FLW)

THE HARTFORD LIFE
INSURANCE COMPANY, and
BLOOMBERG, LP –
NEW YORK, ADMINISTRATOR
OF THE BLOOMBERG LP LONG-
TERM DISABILITY PLAN

Defendant,

**PLAINTIFF'S NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

TO: Natalie Einsig, Esq.
PEPPER HAMILTON LLP
301 Carnegie Center, Suite 400
Princeton, NJ 08543
Attorneys for Defendants

PLEASE TAKE NOTICE that at such time as the Court directs, Plaintiff,

Luciana Baker, by her counsel Thomas J. Hagner, Esq., shall move for summary

judgment against Defendants pursuant to Rule 56 of the Federal Rules of Civil Procedure on the ground that there is no genuine issue as to any material fact and that Luciana Baker is entitled to summary judgment as a matter of law. In support of this motion, Plaintiff adopts the arguments and authority contained in the Brief which is filed in support of this motion and relies on the Statement of Uncontested Material Facts and Certification of Counsel which accompanies the Brief.

A proposed form of Order is attached.

HAGNER & ZOHLMAN, LLC
Attorneys for Plaintiff

Dated: September 25, 2009



Thomas J. Hagner, Esq.